

January 24, 2003

Re: VIM Recycling, Inc. 039-15593-00538

TO: Interested Parties / Applicant

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision - Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, ISTA Building, 150 W. Market Street, Suite 618, Indianapolis, Indiana 46204, **within thirty (30) days from the date of this notice**. The filing for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) the date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision or other order for which you seek review by permit number, the name of the applicant, location, the date of this notice, and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for consideration at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

(over)

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
Administrator, Christine Todd Whitman
401 M Street
Washington, D.C. 20406

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures

FNTVOP.WPD

8-21-02



Frank O'Bannon
Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
P. O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.state.in.us/idem

PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**VIM Recycling, Inc.
29861 Old U.S. Highway 33
Elkhart, Indiana 46516**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T039-15593-00538	
Issued by: Original Signed by Janet McCabe Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: January 24, 2003 Expiration Date: January 24, 2008

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary operation that manufactures landscape mulch, animal bedding, and wood for fuel, using recycled wood as raw material.

Responsible Official:	President
Source Address:	29861 Old U.S. Highway 33, Elkhart, Indiana 46516
Mailing Address:	29861 Old U.S. Highway 33, Elkhart, Indiana 46516
General Source Phone Number:	(574) 642-3677
SIC Code:	2499
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules; Minor Source, under Section 112 of the Clean Air Act; Not 1 of the 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) CBI wood grinder and screen separator, identified as CBI, constructed in 2000, with a maximum capacity to grind seventy-five (75) tons of wood per hour, using a baghouse for control of particulate matter emissions, and exhausting to one (1) stack designated Collector 1X, including associated storage piles;
- (b) One (1) "B" and "C" material transporter and screen, identified as B, C Transport & Screen, constructed in 2000, with a maximum capacity to mechanically transport and screen seventy-five (75) tons of wood per hour, using a baghouse for control of particulate matter emissions, and exhausting to one (1) stack designated Collector 2X, including associated storage piles;
- (c) One (1) CBI wood grinder, identified as CBI, constructed in 2000, with a maximum capacity to grind twenty-five (25) tons of wood per hour, using a baghouse for control of particulate matter emissions, and exhausting to one (1) stack designated Collector 3X, including associated storage piles;
- (d) One (1) "A" material transporter and screen, identified as A Transport & Screen, constructed in 2000, with a maximum capacity to mechanically transport and screen twenty-five (25) tons of wood per hour, using a baghouse for control of particulate matter emissions, and exhausting to one (1) stack designated Collector 3X, including associated storage piles;
- (e) One (1) CBI wood grinder with screen separator, identified as CBI, constructed in 2000, with a maximum capacity to grind twenty-five (25) tons of "recently live" wood per hour, grinding of "recently live" wood outdoors on VIM property, and controlling emissions of fugitive particles through means described in the Fugitive Dust Control Plan, including associated storage piles;

- (f) One (1) Olathe wood grinder with screen separator, identified as Olathe, constructed in 2000, with a maximum capacity to grind twenty-five (25) tons of “recently live” wood per hour, grinding “recently live” wood outdoors on VIM property, and controlling emissions of fugitive particles through means described in the Fugitive Dust Control Plan, including associated storage piles;
- (g) One (1) CBI wood grinder diesel motor, constructed in 2000, with a maximum capacity of eight hundred (800) horsepower per hour (6.0 MMBtu/hr heat input), exhausting to Collector 1X when grinding indoors and exhausting to a mobile engine exhaust when grinding outdoors; and
- (h) One (1) Olathe wood grinder diesel motor, constructed in 2000, with a maximum capacity of three hundred twelve (312) horsepower per hour (2.2 MMBtu/hr heat input), and exhausting to a mobile engine exhaust when grinding outdoors.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1 (21) that have applicable requirements.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B

GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.3 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.
- (c) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.
- (c) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (d) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the

shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP extension notification does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper

maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.12 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and the Northern Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or

Telephone Number: 317-233-5674 (ask for Compliance Section)

Facsimile Number: 317-233-5967

Northern Regional Office Telephone Number: 1-800-753-5519 or (574) 245-4870

Northern Regional Office Facsimile Number: (574) 245-4877

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;

- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deletedby this permit.
- (b) All previous registrations and permits are superseded by this permit.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement

that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
 - (1) A timely renewal application is one that is:

- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are

explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b)(1), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy any records that must be kept under the conditions of this permit;
- (c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)] [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P] [326 IAC 6-3-2]

- (a) Pursuant to 40 CFR 52 Subpart P, the allowable particulate emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2(e)(2), the allowable particulate emissions rate from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour. This condition is not federally enforceable.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the plan submitted on July 17, 2000. The plan is included as Attachment A.

C.7 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.8 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.

C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

- (f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.10 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.11 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.12 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within thirty (30) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within thirty (30) days, the Permittee may extend the compliance schedule related to the equipment for an additional thirty (30) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality

100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial thirty (30) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.13 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.14 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (b) Whenever a condition in this permit requires the measurement of the wind speed, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (c) The Preventive Maintenance Plan for the pH meter shall include calibration using known standards. The frequency of calibration shall be adjusted such that the typical error found at calibration is less than one pH point.
- (d) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.16 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP).

All documents submitted pursuant to this condition shall include the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

C.17 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
 - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
 - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and

implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

- (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]

-
- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
 - (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM,

OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.19 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
- (1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:
- Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.20 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each

deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.22 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Indoor Grinding and Screening of Wood

- (a) One (1) CBI wood grinder and screen separator, identified as CBI, constructed in 2000, with a maximum capacity to grind seventy-five (75) tons of wood per hour, using a baghouse for control of particulate matter emissions, and exhausting to one (1) stack designated Collector 1X, including associated storage piles;
- (b) One (1) "B" and "C" material transporter and screen, identified as B, C Transport & Screen, constructed in 2000, with a maximum capacity to mechanically transport and screen seventy-five (75) tons of wood per hour, using a baghouse for control of particulate matter emissions, and exhausting to one (1) stack designated Collector 2X, including associated storage piles;
- (c) One (1) CBI wood grinder, identified as CBI, constructed in 2000, with a maximum capacity to grind twenty-five (25) tons of wood per hour, using a baghouse for control of particulate matter emissions, and exhausting to one (1) stack designated Collector 3X, including associated storage piles;
- (d) One (1) "A" material transporter and screen, identified as A Transport & Screen, constructed in 2000, with a maximum capacity to mechanically transport and screen twenty-five (25) tons of wood per hour, using a baghouse for control of particulate matter emissions, and exhausting to one (1) stack designated Collector 3X, including associated storage piles;

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 PM and PM10 Limitation [326 IAC 2-2][40 CFR 52.51]

The PM and PM10 emissions from the following units shall be limited as indicated below:

Unit	PM Limitation (lb/hr)	PM10 Limitation (lb/hr)
CBI wood grinder and screen separator - 1X	10.99	10.99
"B" and "C" material transporter and screen - 2X	2.09	2.09
CBI wood grinder and "A" material transporter and screen - 3X	9.11	9.11

These emission limitations, in conjunction with the PM and PM10 emissions from the CBI wood grinder diesel motor and the Olathe wood grinder diesel motor, shall effectively limit the PM and PM10 emissions from the source to less than two hundred fifty (250) tons per year. Fugitive emissions are not counted toward the two hundred fifty (250) ton per year source wide limit because this operation is not one of the 28 listed source categories under 326 IAC 2-2 and there is no applicable New Source Performance Standards that were in effect on August 7, 1980. These limits render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

D.1.2 Particulate Emissions Limitations [326 IAC 6-3-2]

Pursuant to CP039-12174-00538, issued on August 21, 2000, and 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from the listed facilities shall be limited as follows when operating at the listed process weight rates:

Unit	Process Weight Rate (ton/hr)	Particulate Emission Limit (lb/hr)
75 ton per hour CBI wood grinder & screen separator - indoor	75	48.43
"B" and "C" material transporter & screen	75	48.43
25 ton per hour CBI wood grinder & transport screen	25	35.43

These limits were calculated using the following equations:

Interpolation of the data for the process weight rate up to thirty (30) tons per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

Or depending on process weight rate:

Interpolation and extrapolation of the data for the process weight rate in excess of thirty (30) tons per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

D.1.3 Storage Piles

- (a) Pursuant to Agreed Orders 2000-9603-A and 2000-9849-A, signed on August 23, 2001, outdoor storage piles at the source shall:
- (1) Be maintained with a maximum height of twenty (20) feet and a seventy-five (75) foot barrier between the storage pile(s) and the facility property line; and
 - (2) Not be located south of the imaginary line running east-to-west across the northern face of the facilities northern-most building.
- (b) Pursuant to Agreed Orders 2000-9603-A and 2000-9849-A, signed on August 23, 2001, no screening or other processing of any materials that could create fugitive dust emissions shall be conducted outdoors. Moving or loading of material is allowed.

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control devices.

Compliance Determination Requirements

D.1.5 Particulate Emissions

Pursuant to CP039-12174-000538, issued on August 21, 2000, and in order to comply with Conditions D.1.1 and D.1.2, the baghouses for particulate control shall be in operation and control emissions from the listed units at all times that the listed units are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.6 Visible Emissions Notations

- (a) Once per shift visible emission notations of the 75 ton per hour CBI, B, C Transport & Screen, 25 ton per hour CBI, and A Transport & Screen stack exhausts shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.1.7 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses used in conjunction with the 75 ton per hour CBI, B, C Transport & Screen, 25 ton per hour CBI, and A Transport & Screen processes at least once per shift when the 75 ton per hour CBI, B, C Transport & Screen, 25 ton per hour CBI, and A Transport & Screen processes are in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.1.8 Baghouse Inspections

An inspection shall be performed during the last month of each calendar quarter of all bags controlling the 75 ton per hour CBI, B, C Transport & Screen, 25 ton per hour CBI, and A Transport & Screen operations. All defective bags shall be replaced.

D.1.9 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations

may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

D.1.10 Storage Piles

Pursuant to Agreed Orders 2000-9603-A and 2000-9849-A, signed on August 23, 2001, the Permittee shall inspect all ground wood material stored outside for signs of spontaneous combustion. Any fire discovered shall be extinguished immediately.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.11 Record Keeping Requirements

- (a) To document compliance with Condition D.1.6, the Permittee shall maintain records of once per shift visible emission notations of the 75 ton per hour CBI, B, C Transport & Screen, 25 ton per hour CBI, and A Transport & Screen stack exhausts.
- (b) To document compliance with Condition D.1.7, the Permittee shall maintain records of the total pressure drop across the baghouses.
- (c) To document compliance with Condition D.1.8, the Permittee shall maintain records of the results of the inspections required under Condition D.1.8.
- (d) To document compliance with Condition D.1.10, the Permittee shall maintain records of the visual inspections of outdoor ground wood storage piles. These records shall be maintained for a minimum period of twenty-four (24) months and made available upon request of the Office of Air Quality.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Outdoor Grinding and Screening of "Recently Live" Wood

- (e) One (1) CBI wood grinder with screen separator, identified as CBI, constructed in 2000, with a maximum capacity to grind twenty-five (25) tons of "recently live" wood per hour, grinding of "recently live" wood outdoors on VIM property, and controlling emissions of fugitive particles through means described in the Fugitive Dust Control Plan, including associated storage piles;
- (f) One (1) Olathe wood grinder with screen separator, identified as Olathe, constructed in 2000, with a maximum capacity to grind twenty-five (25) tons of "recently live" wood per hour, grinding "recently live" wood outdoors on VIM property, and controlling emissions of fugitive particles through means described in the Fugitive Dust Control Plan, including associated storage piles;

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Emission Limitations [326 IAC 6-3-2]

Pursuant to CP039-12174-00538, issued on August 21, 2000, and 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from the listed facilities shall be limited as follows when operating at the listed process weight rates:

Unit	Process Weight Rate (ton/hr)	Particulate Emission Limit (lb/hr)
CBI wood grinder & screen separator - outdoor	25	35.43
Olathe wood grinder	25	35.43

These limits were calculated using the following equation:

Interpolation of the data for the process weight rate up to thirty (30) tons per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

D.2.2 Fugitive Dust Emissions [326 IAC 6-4-1] [326 IAC 6-4-2]

Pursuant to CP039-12174-00538, issued August 21, 2000, and 326 IAC 6-4-2 (Fugitive Dust Emissions Limitations), emissions of particulate from outdoor "recently live" wood grinding shall be in violation of 326 IAC 6-4 if any of the following criteria are violated:

- (a) A source or combination of sources which cause to exist fugitive dust concentrations greater than sixty-seven percent (67%) in excess of ambient upwind concentrations as determined by the following formula:

$$P = \frac{100 (R - U)}{U}$$

where P = percentage increase

R = number of particles of fugitive dust measured at the downward receptor site
U = number of particles of fugitive dust measured upwind of background site

- (b) The fugitive dust is comprised of fifty percent (50%) or more respirable dust, then the percent increase of dust concentration in subdivision (a) of this section shall be modified as follows:

$$P_R = (1.5 \pm N) * P$$

where P_R = allowable percentage increase in dust concentration above backgrounds

N = fraction of fugitive dust that is respirable dust

P = no value greater than sixty-seven percent (67%)

- (c) The ground level ambient air concentrations exceed fifty (50) micrograms per cubic meter above background concentrations for a sixty (60) minute period.
- (d) If the fugitive dust is visible crossing the boundary or property line or a source. This subdivision may be refuted by factual data expressed in subdivision (a), (b), or (c) of this section.

D.2.3 Storage Piles

- (a) Pursuant to Agreed Orders 2000-9603-A and 2000-9849-A, signed on August 23, 2001, outdoor storage piles at the source shall:
- (1) Be maintained with a maximum height of twenty (20) feet and a seventy-five (75) foot barrier between the storage pile(s) and the facility property line; and
 - (2) Not be located south of the imaginary line running east-to-west across the northern face of the facilities northern-most building.
- (b) Pursuant to Agreed Orders 2000-9603-A and 2000-9849-A, signed on August 23, 2001, no screening or other processing of any materials that could create fugitive dust emissions shall be conducted outdoors. Moving or loading of material is allowed.

D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities.

Compliance Determination Requirements

D.2.5 Fugitive Dust Control [326 IAC 6-5]

The source shall control emissions of fugitive particulate from the outdoor grinding and screening of "recently live" wood through:

- (a) Spraying water, as necessary, during the grinding and screening operation to prevent visible fugitive dust.
- (b) Grinding screening only "recently live" wood outdoors.
- (c) Grinding and screening "recently live" wood during periods when wind speeds, at the VIM property, measure less than ten (10) miles per hour. Wind speed shall be measured hourly while grinding and screening outdoors. In the event of the wind speeds exceeding ten (10) miles per hour during grinding and screening outdoors, operation shall stop until wind speeds slow down to less than ten (10) miles per hour.

- (d) Grinding and screening outdoors a maximum of eight (8) hours in any day.

A copy of the Fugitive Dust Control Plan can be found as Attachment A.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.6 Visible Emissions Notations

- (a) Pursuant to CP039-12174-00538, issued August 21, 2000, and to ensure compliance with Condition D.2.2, the source shall conduct continuous visual observations, by a trained employee to assure that no visible particulate is crossing the VIM property line at any time while the processes are in operation.
- (b) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

D.2.7 Monitoring

Pursuant to CP039-12174-00538, issued August 21, 2000, and in order to comply with Condition D.2.5, the source shall measure the wind speed prior to beginning outdoor grinding and shall continue to measure wind speed hourly while grinding outdoors.

D.2.8 Storage Piles

Pursuant to Agreed Orders 2000-9603-A and 2000-9849-A, signed on August 23, 2001, the Permittee shall inspect all ground wood material stored outside for signs of spontaneous combustion. Any fire discovered shall be extinguished immediately.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.9 Record Keeping Requirements

- (a) To document compliance with Condition D.2.6, the Permittee shall maintain records of the visible observations of fugitive particulate emissions and the hours of operation of the CBI and Olathe grinders.
- (b) To document compliance with Condition D.2.7, the Permittee shall maintain records of the wind speed and the hours of observation of the CBI and Olathe grinders.
- (c) To document compliance with Condition D.2.8, the Permittee shall maintain records of the visual inspections of outdoor ground wood storage piles. These records shall be maintained for a minimum period of twenty-four (24) months and made available upon request of the Office of Air Quality.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Internal Combustion Facilities

- (g) One (1) CBI wood grinder diesel motor, constructed in 2000, with a maximum capacity of eight hundred (800) horsepower per hour (6.0 MMBtu/hr heat input), exhausting to Collector 1X when grinding indoors and exhausting to a mobile engine exhaust when grinding outdoors; and
- (h) One (1) Olathe wood grinder diesel motor, constructed in 2000, with a maximum capacity of three hundred twelve (312) horsepower per hour (2.2 MMBtu/hr heat input), and exhausting to a mobile engine exhaust when grinding outdoors.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Nitrous Oxides (NO_x)

Pursuant to CP039-12174-00538, issued August 21, 2000, the total input of diesel fuel to the two (2) grinders' (CBI and Olathe) diesel motors shall be limited to the following (based on an assumed diesel heating value of 137,000 Btu per gallon):

- (a) CBI grinder diesel motors: 147,168 gallons per twelve (12) consecutive month period with compliance determined at the end of each month; and
- (b) Olathe grinder diesel motors: 15,456 gallons per twelve (12) consecutive month period with compliance determined at the end of each month.

This is equivalent to NO_x emissions of less than forty (40) tons per year.

D.3.2 Sulfur Dioxide (SO₂) [326 IAC 7-1]

Pursuant to CP039-12174-00538, issued August 21, 2000, the sulfur content of the diesel fuel shall not exceed 0.5%. This limit renders the requirements of 326 IAC 7-1 (Sulfur Dioxide Emission Limitations) not applicable as this limit will ensure that the sulfur dioxide emissions from the CBI grinder and Olathe grinder diesel motors do not individually have the potential to emit greater than twenty-five (25) tons per year of sulfur dioxide.

D.3.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

Compliance Determination Requirements

D.3.4 Fuel Limitations

Compliance with Condition D.3.1 shall be demonstrated within 30 days of the end of each month based on the fuel consumption for each grinder during the most recent month.

D.3.5 Sulfur Content

Compliance with Condition D.3.2 shall be determined utilizing one of the following options:

Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the sulfur content of the diesel fuel does not exceed 0.5% by:

- (a) Providing vendor analysis of fuel delivered, if accompanied by a vendor certification, or;

- (b) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
 - (1) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
 - (2) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.3.6 Visible Emissions Notations

- (a) Once per shift visible emission notations of CBI and Olathe grinder diesel motor stack exhaust shall be performed during normal daylight operations when firing diesel fuel. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.7 Record Keeping Requirements

- (a) To document compliance with Condition D.3.1, the Permittee shall maintain records of the CBI and Olathe grinder diesel motor monthly fuel usage.
- (b) To document compliance with Condition D.3.2, the Permittee shall maintain records of the sulfur content of the fuel oil used by the CBI and Olathe grinder diesel motors.
- (c) To document compliance with Condition D.3.6, the Permittee shall maintain records of once per shift visible emission notations of the CBI and Olathe diesel motor stack exhaust.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.8 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.3.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: VIM Recycling, Inc.
Source Address: 2981 Old U.S. Highway 33, Elkhart, IN 46516
Mailing Address: 2981 Old U.S. Highway 33, Elkhart, IN 46516
Part 70 Permit No.: 039-15593-00538

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Affidavit (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: VIM Recycling, Inc.
Source Address: 2981 Old U.S. Highway 33, Elkhart, IN 46516
Mailing Address: 2981 Old U.S. Highway 33, Elkhart, IN 46516
Part 70 Permit No.: 039-15593-00538

This form consists of 2 pages

Page 1 of 2

- 9** This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
 - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

OFFICE OF AIR QUALITY

Compliance Data Section

Part 70 Quarterly Report

Source Name: VIM Recycling, Inc.
Source Address: 2981 Old U.S. Highway 33, Elkhart, IN 46516
Mailing Address: 2981 Old U.S. Highway 33, Elkhart, IN 46516
Part 70 Permit No.: 039-15593-00538
Facility: CBI and Olathe wood grinder diesel motors
Parameter: Fuel Usage
Limit: 147,168 gallons per twelve (12) consecutive month period with compliance determined at the end of each month for the CBI grinder.
15,456 gallons per twelve (12) consecutive period with compliance determined at the end of each month for the Olathe grinder.

YEAR: _____

Month	Column 1		Column 2		Column 1 + Column 2	
	This Month		Previous 11 Months		12 Month Total	
	CBI	Olathe	CBI	Olathe	CBI	Olathe
Month 1						
Month 2						
Month 3						

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
Compliance Data Section**

**PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: VIM Recycling, Inc.
Source Address: 2981 Old U.S. Highway 33, Elkhart, IN 46516
Mailing Address: 2981 Old U.S. Highway 33, Elkhart, IN 46516
Part 70 Permit No.: 039-15593-00538

Months: _____ to _____ Year: _____

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Attachment A

Fugitive Dust Control Plan Approved July 17, 2000

VIM Recycling, Inc.
29861 Old U.S. Highway 33
Elkhart, Indiana 46516

Section 1 - Introduction

The following control plan, when implemented, is designed to reduce uncontrolled fugitive dust generated from paved roadways and areas, unpaved roadways and areas, aggregated storage piles, and grinding and screening of wood outdoors.

The plan shall be implemented on a year-round basis until such a time as another plan is approved or ordered by the Indiana Department of Air Quality.

The person on site who is responsible for implementing the plan is:

VIM Recycling, Inc.
Kenneth R. Will
P.O. Box 808
Goshen, Indiana 46527-0808

Section 2 - Outdoor Grinding and Screening

The following shall control fugitive particulate matter emissions from the outdoor grinding and screening of "recently live"¹ wood:

- (a) Spraying water, as necessary, during the grinding and screening operation to prevent visible fugitive dust.
- (b) Grinding and screening only "recently live" wood outdoors.
- (c) Grinding and screening "recently live" wood during periods when wind speeds, at the VIM Recycling property, measure less than ten (10) miles per hour. Wind speed shall be measured hourly when grinding and screening outdoors. In the event of the wind speeds exceeding ten (10) miles per hour during grinding and screening outdoors, operation shall stop until wind speeds slow down to less than ten (10) miles per hour.
- (d) Grinding and screening outdoors a maximum of eight (8) hours in any day.

Section 3 - Paved Roads and Areas

¹ "recently live" wood - wood, including trunk, branches, and leaves, that has not been processed or cut into dimensional lumber, and has been stored no longer than sixty (60) days onsite.

Dust from paved roads and areas will be controlled by sweeping and shall be performed every 14 days or more often to prevent visible fugitive dust from crossing the VIM property line, as determined by a trained employee², from these areas. Records of sweeping will be required.

Exceptions - Cleaning of paved roads and areas may be delayed by one day when:

- (a) 0.1 or more inches of rain has accumulated during the 24-hour period prior to the scheduled cleaning.
- (b) The road segments or areas is closed or abandoned. Abandoned roads or areas will be barricaded to prevent vehicle access.
- (c) It is raining at the time of the scheduled cleaning.

Section 4 - Unpaved Roads and Areas

Unpaved roads and areas at the facility shall be sprayed with water, as necessary, for dust control to prevent fugitive dust from crossing the VIM property line. A trained employee shall determine visual particulate emissions, visual observation shall be made twice daily, and records shall be kept of these observations in the journal. Records of spraying water onto unpaved roads and areas shall also be required.

Exceptions - Treating of unpaved roads and areas may be delayed by one day when:

- (a) 0.1 or more inches of rain has accumulated during the 24-hour period prior to the scheduled cleaning.
- (b) The road segments or areas are frozen or covered by ice, snow, or standing water.
- (c) The road segments or areas is closed or abandoned. Abandoned roads or areas will be barricaded to prevent vehicles from traveling on the roads or areas.

Section 5 - Open Aggregate Storage Piles

Open aggregate piles will consist of only landscape mulch and scrap wood. the sue of water as a dust suppressant shall be the primary means of dust control. The water shall be applied, as necessary, to the aggregate storage piles to prevent emission of fugitive particulate matter from crossing the VIM property line. A trained employee shall determine visual particulate emission, visual observation shall be made twice daily, and a record shall be kept of these observations in the journal. Records of spraying water onto piles shall also be required.

Exceptions - Treating of aggregate storage piles may be delayed by one day when:

- (a) 0.1 or more inches of rain has accumulated during the 24-hour period prior to the scheduled cleaning.
- (b) The storage piles are frozen or covered by ice or snow.

Section 6 - Material Handling

Front-end loaders will be used to maintain the aggregate storage piles. Fugitive particulate matter from loading and unloading of outdoor aggregate storage piles shall be controlled by the following: spraying

² trained employee - an employee that has worked at the source at least one (1) month and has been trained in the appearance and characteristics of normal visible dust emissions for that specific process

with water, as necessary, when determined by a trained employee, and reduction of the free fall distance between the front-end loader and truck.

Fugitive particulate matter control from the loading and unloading of indoor storage piles shall be accomplished by the following: trucks shall be loaded with materials stored in the VIM building only within the building.

Section 7 - Monitoring and Record Keeping

Records shall be kept in a journal, which will be updated daily by the responsible official. The journals shall be kept in storage for a minimum of three (3) years and shall be available for inspection or copying upon reasonable prior notice. The following information will be required in the journal with each entry:

Grinding and Screening Outdoors:

- (a) Name of trained employee making observations
- (b) Wind speed prior to startup of grinding and screening outdoors
- (c) Hourly readings of wind speed while grinding and screening outdoors
- (d) Hours of operation for grinding and screening in a day

Paved Roads and Areas

- (a) Name of trained employee making observations
- (b) Record of the dates when areas are swept

Unpaved Roads and Areas and Aggregate Storage Piles

- (a) Name of trained employee making observations
- (b) Date and time the observations were made
- (c) Date and time when water is applied

Section 8 - Compliance Schedule

This plan shall be fully implemented when construction is complete. Until that time, the plan shall be implemented within portions of the site where construction is considered complete. Where construction is incomplete, appropriate control measures shall be implemented, but cannot be comprehensively addressed. These activities shall be included in the journal.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name: VIM Recycling, Inc.
Source Location: 29861 Old U.S. Highway, Elkhart, Indiana 46516
County: Elkhart
SIC Code: 2499
Operation Permit No.: T039-15593-00538
Permit Reviewer: ERG/KC

The Office of Air Quality (OAQ) has reviewed a Part 70 permit application from VIM Recycling, Inc. relating to the operation that manufactures landscape mulch, animal bedding, and wood for fuel, using recycled wood as raw material.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) CBI wood grinder and screen separator, identified as CBI, constructed in 2000, with a maximum capacity to grind seventy-five (75) tons of wood per hour, using a baghouse for control of particulate matter emissions, and exhausting to one (1) stack designated Collector 1X, including associated storage piles;
- (b) One (1) "B" and "C" material transporter and screen, identified as B, C Transport & Screen, constructed in 2000, with a maximum capacity to mechanically transport and screen seventy-five (75) tons of wood per hour, using a baghouse for control of particulate matter emissions, and exhausting to one (1) stack designated Collector 2X, including associated storage piles;
- (c) One (1) CBI wood grinder, identified as CBI, constructed in 2000, with a maximum capacity to grind twenty-five (25) tons of wood per hour, using a baghouse for control of particulate matter emissions, and exhausting to one (1) stack designated Collector 3X, including associated storage piles;
- (d) One (1) "A" material transporter and screen, identified as A Transport & Screen, constructed in 2000, with a maximum capacity to mechanically transport and screen twenty-five (25) tons of wood per hour, using a baghouse for control of particulate matter emissions, and exhausting to one (1) stack designated Collector 3X, including associated storage piles;
- (e) One (1) CBI wood grinder with screen separator, identified as CBI, constructed in 2000, with a maximum capacity to grind twenty-five (25) tons of "recently live" wood per hour, grinding of "recently live" wood outdoors on VIM property, and controlling emissions of fugitive particles through means described in the Fugitive Dust Control Plan, including associated storage piles;

- (f) One (1) Olathe wood grinder with screen separator, identified as Olathe, constructed in 2000, with a maximum capacity to grind twenty-five (25) tons of "recently live" wood per hour, grinding "recently live" wood outdoors on VIM property, and controlling emissions of fugitive particles through means described in the Fugitive Dust Control Plan, including associated storage piles;
- (g) One (1) CBI wood grinder diesel motor, constructed in 2000, with a maximum capacity of eight hundred (800) horsepower per hour (6.0 MMBtu/hr heat input), exhausting to Collector 1X when grinding indoors and exhausting to a mobile engine exhaust when grinding outdoors; and
- (h) One (1) Olathe wood grinder diesel motor, constructed in 2000, with a maximum capacity of three hundred twelve (312) horsepower per hour (2.2 MMBtu/hr heat input), and exhausting to a mobile engine exhaust when grinding outdoors.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

New Emission Units and Pollution Control Equipment Receiving Advanced Source Modification Approval

There are no new emission units and pollution control equipment receiving advanced source modification approval during this review process.

Insignificant Activities

This source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1(21).

Existing Approvals

The source has constructed or has been operating under the following previous approvals:

CP039-12174-00538, issued August 21, 2000.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have either been incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

The following terms and conditions from previous approvals have been determined no longer applicable; therefore, were not incorporated into this Part 70 permit:

- (a) All construction conditions from all previously issued permits.

Reason Not Incorporated: All facilities previously permitted have already been constructed; therefore, the construction conditions are no longer necessary as part of the operating permit. Any facilities that were previously permitted but have not yet been constructed would need new pre-construction approval before beginning construction.
- (b) Condition C.9 of CP039-12174-00538, issued August 21, 2000. This condition reads as follows:

The Permittee shall fully implement the Fugitive Dust Control Plan dated July 17, 2000, as seen in Attachment A, upon completion of construction. Until that time, the plan shall be implemented within portions of the site where construction is considered to be complete. Where construction is incomplete, appropriate control measures shall be implemented, but cannot be comprehensively addressed:

- (1) Using wet suppression on storage piles, unpaved roads and areas, and while outdoor grinding and screening outdoors to prevent visible fugitive dust from crossing VIM property line.
- (2) Grinding and screening outdoors when wind speeds, at the VIM property, measure less than ten (10) miles per hour.
- (3) Grinding only recently live wood outdoors.
- (4) Cleaning paved roads and areas.

Reason Not Incorporated: This condition is applicable when construction is not complete. Construction at VIM Recycling is complete and therefore, the permit states that they must fully comply with the Fugitive Dust Control Plan dated July 17, 2000.

- (c) Condition D.1.1 and D.2.1 of CP039-12174-00538, issued August 21, 2000. These conditions provide limitations pursuant to 326 IAC 6-3-2.

Reason Not Included: The limits contained in these conditions were not included in this Part 70 permit because, pursuant to the equations provided in 326 IAC 6-3-2, the limits are not correct. Correct limits pursuant to 326 IAC 6-3-2 were included in this permit.

- (d) Condition D.1.5 of CP039-12174-00538, issued August 21, 2000. This condition required daily visible emissions notations.

Reason Not Incorporated: The daily visible emissions notations were changed to once per shift visible emissions notations in this permit. The visible emissions notations are required to ensure compliance with 326 IAC 5-1 and 326 IAC 6-3-2 and IDEM believes that once per shift notations are necessary to ensure continuous compliance.

Enforcement Issue

- (a) IDEM is aware that the Affidavit of Construction was received on December 19, 2000. At this point, the VIM recycling was subject to the Part 70 program and therefore should have submitted an application for a Part 70 permit or FESOP within 12 months. The application for this Part 70 permit was received on February 13, 2002.
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on February 13, 2002.

There was no notice of completeness letter mailed to the source.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (page 1 through 5).

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	47,809
PM-10	47,733
SO ₂	16.06
VOC	6.1
CO	31.49
NO _x	126.59

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Benzene	2.9x10 ⁻²
Toluene	1.2x10 ⁻²
Xylene	7.8x10 ⁻³
Propylene	9.8x10 ⁻²
Formaldehyde	1.3x10 ⁻²
Acetaldehyde	8.0x10 ⁻³
TOTAL	0.17

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM10 and NOx are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2000 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	--
PM-10	20
SO ₂	--
VOC	--
CO	--

Pollutant	Actual Emissions (tons/year)
NO _x	--
HAPs	--

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 operating permit.

Process/facility	Potential to Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
75 ton per hour CBI wood grinder and screen separator (Collector 1X)	Less than 48.15 (326 IAC 2-2) ¹	Less than 48.15 (326 IAC 2-2) ¹	0	0	0	0	0
"B" and "C" material transporter and screen (Collector 2X)	Less than 9.15 (326 IAC 2-2) ¹	Less than 9.15 (326 IAC 2-2) ¹	0	0	0	0	0
25 ton per hour CBI wood grinder and "A" material transporter and screen (Collector 3X)	Less than 39.89 (326 IAC 2-2) ¹	Less than 39.89 (326 IAC 2-2) ¹	0	0	0	0	0
CBI wood grinder and Olathe wood grinder diesel motors	5.62	4.14	16.06	6.1	31.49	Less than 40 ²	Neg.
Fugitive Emission Units (outdoor grinding from the CBI and Olathe grinders, storage piles, storage pile handling, unpaved roads) ³	125.69	48.97	0	0	0	0	0
Total Emissions	228.5	150.3	16.06	6.1	31.49	Less than 40	Neg.

Note: All emissions shown are at maximum capacity unless otherwise footnoted.

¹ These units are also subject to the requirements of 326 IAC 6-3-2 (Process Operations). Compliance with the limits to render the requirements of 326 IAC 2-2 not applicable, ensures compliance with the 326 IAC 6-3-2 limits.

² Pursuant to CP039-12174-00538, issued August 21, 2000, the source is limited to less than 40 tons per year of NO_x so that additional NO_x emitting equipment can be added to the source and the PSD minor status of the source can be maintained. Any additional equipment shall be approved by IDEM, OAQ.

³ Emissions from the CBI and Olathe grinders are also subject to 326 IAC 6-3-2.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM-10	Attainment
SO ₂	Attainment
NO ₂	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

- (b) Elkhart County has been classified as attainment or unclassifiable for PM₁₀, SO₂, NO₂, CO, and lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.
- (c) This source is subject to the provisions of 40 CFR 64, Compliance Assurance Monitoring (CAM). In order for this rule to apply, a specific emissions unit must meet three criteria for a given pollutant: 1) the unit is subject to an emission limitation or standard for the applicable regulated air pollutant, 2) the unit uses a control device to achieve compliance with any such emission limitation or standard, and, 3) the unit has potential pre-control device emissions of the applicable regulated air pollutant that are equal or greater than 100 percent of the amount required for a source to be classified as a major source. For this source, 75 ton per hour CBI wood grinder and screen separator (CBI), "B" and "C" material transporter and screen (B, C Transport & Screen), 25 ton per hour CBI wood grinder (CBI), and the "A" material transporter and screen (A Transport & Screen) each have the potential to emit, before controls, of greater than one hundred (100) tons per year of particulate matter. Additionally, 326 IAC 2-2 (Prevention of Significant Deterioration), 40 CFR 52.21, and 326 IAC 6-3-2 (Process Operations) provide particulate matter emission limitations for each operation. The baghouses, identified as Collector 1X, 2X, and 3X, are used to comply with these limits. The post-control potential to emit from each of these units is less than one hundred (100) tons per year of particulate matter. Pursuant to 40 CFR 64.5(b), the Permittee is required to submit the information required under 40 CFR 64.4 as part of the Part 70 renewal application.
- (d) The requirements of Section 112(j) of the Clean Air Act (40 CFR Part 63.50 through 63.56) are not applicable to this source because the source is not a major source of HAPs (i.e., the source does not have the potential to emit 10 tons per year or greater of a single HAP or 25 tons per year or greater of a combination of HAPs) and the source does not include one or more units that belong to one or more source categories affected by the Section 112(j) MACT Hammer date of May 15, 2002.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

The uncontrolled PM and PM10 emissions from this source are greater than 250 tons per year. (The source is not one of the 28 listed source categories.) This was overlooked during the preparation of CP 039-12174-00538, issued on August 21, 2000, and no specific limit to render PSD not applicable was included. Limits to stay below the 250 tons per year PSD applicability threshold are being added to this permit in order to correct this oversight. The source has never actually exceeded 250 tons per year of PM or PM10 because baghouses were required to meet 326 IAC 6-3-2 which kept actual emissions below the PSD threshold.

The PM and PM10 emissions from the following units shall be limited as indicated below:

Unit	PM and PM10 Limitation (lb/hr)	PM and PM10 Limitation (ton/yr)
CBI wood grinder and screen separator - 1X	10.99	48.15
"B" and "C" material transporter and screen - 2X	2.09	9.15
CBI wood grinder and "A" material transporter and screen - 3X	9.11	39.89

These emission limitations, in conjunction with the PM and PM10 emissions from the CBI wood grinder diesel motor and the Olathe wood grinder diesel motor, shall effectively limit the PM and PM10 emissions from the source to less than two hundred fifty (250) tons per year. Fugitive emissions are not counted toward the two hundred fifty (250) ton per year source wide limit because this operation is not one of the 28 listed source categories under 326 IAC 2-2 and there is no applicable New Source Performance Standards that were in effect on August 7, 1980. These limits render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

This source does not have the potential to emit greater than ten (10) tons per year of a single HAP or greater than twenty-five (25) tons per year of any combination of HAPs. Therefore this source is not subject to 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants).

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year of NOx and the source is located in Elkhart County. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to CP039-12174-00538, issued on August 21, 2000, and 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from the listed facilities shall be limited as follows when operating at the listed process weight rates:

Unit	Process Weight Rate (ton/hr)	Particulate Emission Limit (lb/hr)
75 ton per hour CBI wood grinder & screen separator - indoor	75	48.43
"B" and "C" material transporter & screen	75	48.43
25 ton per hour CBI wood grinder & transport screen	25	35.43
CBI wood grinder & screen separator - outdoor	25	35.43
Olathe wood grinder	25	35.43

These limits were calculated using the following equations:

Interpolation of the data for the process weight rate up to thirty (30) tons per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

Or depending on process weight rate:

Interpolation and extrapolation of the data for the process weight rate in excess of thirty (30) tons per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

The baghouses and fugitive dust control plan shall be in operation at all times the listed facilities are in operation, in order to comply with these limits.

326 IAC 6-4-2 (Fugitive Dust Emissions Limitations)

Pursuant to CP039-12174-00538, issued August 21, 2000, and 326 IAC 6-4-2 (Fugitive Dust Emissions Limitations), emissions of particulate from outdoor "recently live" wood grinding shall be in violation of 326 IAC 6-4 if any of the following criteria are violated:

- (a) A source or combination of sources which cause to exist fugitive dust concentrations greater than sixty-seven percent (67%) in excess of ambient upwind concentrations as determined by the following formula:

$$P = \frac{100 (R - U)}{U}$$

where P = percentage increase
R = number of particles of fugitive dust measured at the downward receptor site
U = number of particles of fugitive dust measured upwind of background site

- (b) The fugitive dust is comprised of fifty percent (50%) or more respirable dust, then the percent increase of dust concentration in subdivision (a) of this section shall be modified as follows:

$$P_R = (1.5 \pm N) * P$$

where P_R = allowable percentage increase in dust concentration above backgrounds

N = fraction of fugitive dust that is respirable dust

P = no value greater than sixty-seven percent (67%)

- (c) The ground level ambient air concentrations exceed fifty (50) micrograms per cubic meter above background concentrations for a sixty (60) minute period.
- (d) If the fugitive dust is visible crossing the boundary or property line or a source. This subdivision may be refuted by factual data expressed in subdivision (a), (b), or (c) of this section.

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

This source is subject to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations) because it is a source of fugitive dust and was constructed after 1985. Pursuant to this rule, the source shall control fugitive emissions according to the Fugitive Dust Control Plan submitted by VIM Recycling, Inc. and approved on July 17, 2000. This plan is included as Attachment A of the permit.

Agreed Orders 2000-9603-A and 2000-9849-A

- (a) Pursuant to Agreed Orders 2000-9603-A and 2000-9849-A, signed on August 23, 2001, outdoor storage piles at the source shall:
- (1) Be maintained with a maximum height of twenty (20) feet and a seventy-five (75) foot barrier between the storage pile(s) and the facility property line; and
 - (2) Not be located south of the imaginary line running east-to-west across the northern face of the facilities northern-most building.
- (b) Pursuant to Agreed Orders 2000-9603-A and 2000-9849-A, signed on August 23, 2001, no screening or other processing of any materials that could create fugitive dust emissions shall be conducted outdoors. Moving or loading of material is allowed.
- (c) Pursuant to Agreed Orders 2000-9603-A and 2000-9849-A, signed on August 23, 2001, the Permittee shall inspect all ground wood material stored outside for signs of spontaneous combustion. Any fire discovered shall be extinguished immediately.

This is a new requirement that was not included in CP039-12174-00538, issued August 21, 2000. The Agreed Orders had not been signed when the construction permit was issued.

State Rule Applicability - Diesel Motors

CP039-12174-00538, issued on August 21, 2000

- (a) Pursuant to CP039-12174-00538, issued August 21, 2000, the total input of diesel fuel for the two (2) grinders' (CBI and Olathe) diesel motors shall be limited to the following (based on an assumed diesel heating value of 137,000 Btu per gallon):
- (1) CBI grinder diesel motor: 147,168 gallons per twelve (12) consecutive month period with compliance determined at the end of each month; and

- (2) Olathe grinder diesel motor: 15,456 gallons per twelve (12) consecutive month period with compliance determined at the end of each month.

This is equivalent to NOx emissions of less than forty (40) tons per year.

- (b) Pursuant to CP039-12174-00538, the sulfur content of the diesel fuel shall not exceed 0.5%.

The source requested that these limits be retained.

326 IAC 7-1 (Sulfur Dioxide Emission Limitations)

This source is not subject to the requirements of 326 IAC 7-1 (Sulfur Dioxide Emission Limitations) because no facility has the potential to emit greater than twenty-five (25) tons per year of sulfur dioxide.

326 IAC 10-1 (Nitrogen Oxides Control in Clark and Floyd Counties)

This source is not subject to the requirements of 326 IAC 10-1 (Nitrogen Oxides Control in Clark and Floyd Counties) because this source is not located in Clark or Floyd Counties. This source is located in Elkhart County.

326 IAC 10-3 (Nitrogen Oxide Reduction Program for Specific Source Categories)

This source is not subject to the requirements of 326 IAC 10-3 (Nitrogen Oxide Reduction Program for Specific Source Categories) because this source is not a Portland cement kiln, a specifically listed boiler, or a blast furnace gas fired boiler with a heat input capacity greater than two hundred fifty (250) million British thermal units per hour.

326 IAC 10-4 (Nitrogen Oxides Budget Trading Program)

This source is not subject to the requirements of 326 IAC 10-4 (Nitrogen Oxides Budget Trading Program) because this source does not contain any NOx budget units as described in 326 IAC 10-4-1 and is, therefore, not a NOx budget source.

Testing Requirements

- (a) Testing was not required pursuant to CP039-12174-00538, issued August 21, 2000, and is not required by this permit for any of the PM and PM10 emitting sources. There is no evidence that the source is not in compliance with 326 IAC 6-3-2 and the use of baghouses ensures compliance with 326 IAC 2-2.
- (b) Testing was not required pursuant to CP039-12174-00538, issued August 21, 2000, and is not required by this permit for diesel motors. The quarterly report will ensure that the source is in compliance with the NOx emission limits.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance

Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The 75 ton per hour CBI wood grinder and screen separator, "B" and "C" material transporter and screen, 25 ton per hour CBI wood grinder, and "A" material transporter and screen have applicable compliance monitoring conditions as specified below:
 - (a) Once per shift visible emissions notations of the 75 ton per hour CBI wood grinder and screen separator, "B" and "C" material transporter and screen, 25 ton per hour CBI wood grinder, and "A" material transporter and screen stack exhaust shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
 - (b) The Permittee shall record the total static pressure drop across the baghouses controlling the 75 ton per hour CBI wood grinder and screen separator, "B" and "C" material transporter and screen, 25 ton per hour CBI wood grinder, and "A" material transporter and screen, at least once per shift when the 75 ton per hour CBI wood grinder and screen separator, "B" and "C" material transporter and screen, 25 ton per hour CBI wood grinder, and "A" material transporter and screen are in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouses shall be maintained within the range of 3.0 to 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
 - (c) An inspection shall be performed during the last month of each quarter of all bags controlling the 75 ton per hour CBI, B, C Transport and Screen, 25 ton per hour CBI, and A Transport and Screen operations. All defective bags shall be replaced.
 - (d) Pursuant to Agreed Orders 2000-9603-A and 2000-9849-A, signed on August 23, 2001, the Permittee shall inspect all ground wood material stored outside for signs of spontaneous combustion. Any fire discovered shall be extinguished immediately.

2. The CBI wood grinder and screen separator and Olathe wood grinder with screen separator both grinding “recently live” wood have applicable compliance monitoring conditions as specified below:
 - (a) The Permittee shall conduct continuous visual observations, by a trained employee to assure that no visible particulate is crossing the VIM property line at any time while the processes are in operation.
 - (b) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
 - (c) The Permittee shall measure the wind speed prior to beginning outdoor grinding and shall continue to measure wind speed hourly while grinding outdoors.
 - (d) Pursuant to Agreed Orders 2000-9603-A and 2000-9849-A, signed on August 23, 2001, the Permittee shall inspect all ground wood material stored outside for signs of spontaneous combustion. Any fire discovered shall be extinguished immediately.

The following new compliance monitoring requirements were incorporated into this Part 70 permit:

3. The CBI wood grinder and Olathe wood grinder diesel motors both have applicable compliance monitoring conditions as specified below:
 - (a) Once per shift visible emissions notations of the CBI and Olathe grinder diesel motor stack exhaust shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously “normal” means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

These monitoring conditions are necessary because the baghouses for the CBI wood grinder and screen separator, “B” and “C” material transporter and screen, Bliss wood grinder, and “A” material transporter and screen must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

Conclusion

The operation of this source that manufactures landscape mulch, animal bedding, and wood for fuel, using recycled wood as raw material shall be subject to the conditions of the attached proposed Part 70 Permit No. T039-15593-00538.

Appendix A: Emission Calculations
Particulate Matter from Woodworking Operation

Page 1 of 5

Company Name: VIM Recycling, Inc.
Address City IN Zip: 29861 Old U.S. Highway 33, Elkhart, IN 46516
Permit Number: 039-15593-00538
Pit ID: 039-00538
Reviewer: ERG/KC

Calculation of Grain Loading

	Collector 1	Collector 2	Collector 3
grains/lb	7000	7000	7000
grains/hr at inlet	30779000	2926000	42497000
grains/min at inlet	512983.33	48766.67	708283.33
collection efficiency	99.75%	99.50%	99.85%
grains/min discharged	1282.46	243.83	1062.42
acfm	85590	16250	71100
grains/cu ft	0.015	0.015	0.015

Calculation of PTE

	Uncontrolled Particulate Emissions (ton/yr)	Controlled Particulate Emissions (ton/yr)	Hours of Operation (hr/yr)	Actual Particulate Emissions (ton/yr)
Collector 1	19258.86	48.15	2600	14.29
Collector 2	1830.84	9.15	2600	2.72
Collector 3	26590.98	39.89	4000	18.21
Totals	47680.68	97.19		35.22

Appendix A: Emission Calculations
Uncontrolled Internal Combustion Engines - Diesel Fuel

F

Company Name: VIM Recycling, Inc.
Address City IN Zip: 29861 Old U.S. Highway 33, Elkhart, IN 46516
Permit Number: 039-15593-00538
Plt ID: 039-00538
Reviewer: ERG/KC

Diesel Engine (>250 and <600 HP)
Olathe (312 HP)

Emissions calculated based on heat input capacity (MMBtu/hr)

Heat Input Capacity
MM Btu/hr

Limited Fuel Use
gal/yr

2.2

15,456

Emission Factor in lb/MMBtu	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	0.31	0.31	0.29	4.41	0.4	0.95
Potential Emission in tons/yr	2.99	2.99	2.79	42.49	3.47	9.15
Limited Emissions in ton/yr	0.33	0.33	0.31	4.67	0.38	1.01

Methodology

Emission Factors are from AP42 (Supplement B 10/96), Table 3.3-1

Emission (ton/yr) = Heat input rate (MMBtu/hr) * Emission Factor (lb/MMBtu) * 8760 (hr/yr) / 2000 (lb/ton)

*PM emission factors are assumed to be equivalent to PM10 emission factors. No information was given regarding which method was used to determine the factor or the fraction of PM10 which is condensable.

Emission Factor in lb/MMBtu	Pollutant					
	Benzene	Toluene	Xylene	Propylene	Formaldehyde	Acetaldehyde
	9.33E-04	4.90E-04	2.85E-04	2.58E-03	1.18E-03	7.67E-04
Potential Emission in tons/yr	8.99E-03	4.72E-03	2.75E-03	2.49E-02	1.14E-02	7.39E-03
Limited Emissions in ton/yr	9.88E-04	5.19E-04	3.02E-04	2.73E-03	1.25E-03	8.12E-04

Methodology

Emission Factors are from AP42 (Supplement B 10/96), Table 3.3-2

Emission (ton/yr) = Heat input rate (MMBtu/hr) * Emission Factor (lb/MMBtu) * 8760 (hr/yr) / 2000 (lb/ton)

Appendix A: Emission Calculations
Uncontrolled Internal Combustion Engines - Diesel Fuel

Page 3 of 5

Company Name: VIM Recycling, Inc.
Address City IN Zip: 29861 Old U.S. Highway 33, Elkhart, IN 46516
Permit Number: 039-15593-00538
Pit ID: 039-00538
Reviewer: ERG/KC

Diesel Engine (>600 HP)
CBI (800 HP)

Emissions calculated based on heat input capacity (MMBtu/hr)

Heat Input Capacity Limited Fuel Use S = 0.5 = Weight % Sulfur
MM Btu/hr gal/yr

6.0

147,168

Emission Factor in lb/MMBtu	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	0.1	0.0573	0.51 (1.01S)	3.20 **see below	0.1	0.85
Potential Emission in tons/yr	2.63	1.51	13.27	84.10	2.63	22.34
Limited Emissions in ton/yr	1.01	0.58	5.09	32.26	1.01	8.57

Methodology

Emission Factors are from AP42 (Supplement B 10/96), Table 3.4-1 and Table 3.4-2

Emission (ton/yr) = Heat input rate (MMBtu/hr) * Emission Factor (lb/MMBtu) * 8760 (hr/yr) / 2000 (lb/ton)

*No information was given regarding which method was used to determine the PM emission factor or whether condensible PM is included. The PM10 emission factor is filterable and condensible PM10 combined.

Emission Factor in lb/MMBtu	Pollutant					
	Benzene	Toluene	Xylene	Propylene	Formaldehyde	Acetaldehyde
	7.76E-04	2.81E-04	1.93E-04	2.79E-03	7.90E-05	2.50E-05
Potential Emission in tons/yr	2.04E-02	7.38E-03	5.07E-03	7.33E-02	2.08E-03	6.57E-04
Limited Emissions in ton/yr	7.82E-03	2.83E-03	1.95E-03	2.81E-02	7.96E-04	2.52E-04

Methodology

Emission Factors are from AP42 (Supplement B 10/96), Table 3.4-3

Emission (ton/yr) = Heat input rate (MMBtu/hr) * Emission Factor (lb/MMBtu) * 8760 (hr/yr) / 2000 (lb/ton)

**Appendix A: Emission Calculations
Fugitive Emissions**

Page 4 of 5

Company Name: VIM Recycling, Inc.
Address City IN Zip: 29861 Old U.S. Highway 33, Elkhart, IN 46516
Permit Number: 039-15593-00538
Plt ID: 039-00538
Reviewer: ERG/KC

Storage Piles

$$E_f = 1.7 (s/1.5) * (365-p) / 235 * (f/15)$$

$$= 9.72 \text{ lb/ac/day}$$

where: s = 8.4 % silt content of material
 p = 125 days of rain greater than or equal to 0.01 inches
 f = 15 % of wind greater than or equal to 12 mph

Storage Pile	Acreage	Fugitive Emissions (ton/yr)
1	3	5.32
2	2	3.55
3	3	5.32
4	1	1.77
Total		15.97

Storage Pile Handling

$$E_f = k * (0.0032) * (U/5)^{1.3} / (M/2)^{1.4}$$

k value for:

PM	PM10
0.74	0.35

U value = 10

Storage Pile	Acreage	M = Moisture Content (% by weight)	Emission Factor (PM)	Emission Factor (PM10)	PM Fugitive Emissions (ton/yr)	PM10 Fugitive Emissions (ton/yr)
1	3	40	8.80E-05	4.16E-05	0.0009	0.0004
2	2	14	3.82E-04	1.81E-04	0.0038	0.0018
3	3	14	3.82E-04	1.81E-04	0.0038	0.0018
4	1	14	3.82E-04	1.81E-04	0.0038	0.0018
Total					0.0123	0.0058

Appendix A: Emission Calculations Fugitive Emissions

Company Name: VIM Recycling, Inc.
Address City IN Zip: 29861 Old U.S. Highway 33, Elkhart, IN 46516
Permit Number: 039-15593-00538
Plt ID: 039-00538
Reviewer: ERG/KC

Unpaved Roads

The following calculations determine the amount of emissions created by unpaved roads, based on 8760 hours of use and AP42, Ch. 13.2.2 (Supplement E, 9/98)

$$\begin{aligned}
 &150 \text{ trip/hr} \times \\
 &0.037 \text{ mile/trip} \times \\
 &2 \text{ (round trip)} \times \\
 &8760 \text{ hr/yr} = \qquad \qquad \qquad 97236 \text{ miles per year}
 \end{aligned}$$

PM

Method: $E_f = \{k * [(s/12)^{0.8}] * [(W/3)^b] / [(Mdry/0.2)^c] \} * [(365-p) / 365]$
 $= 2.26$

where:

- k = 10 (particle size multiplier for PM-10) (k = 10 for PM-30 or TSP)
- s = 4.8 mean % silt content of unpaved roads
- b = 0.5 Constant for PM-10 (b = 0.5 for PM-30 or TSP)
- c = 0.4 Constant for PM-10 (c = 0.4 for PM-30 or TSP)
- W = 35 tons average vehicle weight
- Mdry = 10 surface material moisture content, %
- p = 125 no. of days with at least 0.254mm of precipitation (see Fig/ 13.2.2-1)

$$2.26 \text{ lb/mi} * \qquad \qquad 97236 \text{ mi/yr} = \qquad \qquad 109.71 \text{ ton/yr}$$

PM10

Method: $E_f = \{k * [(s/12)^{0.8}] * [(W/3)^b] / [(Mdry/0.2)^c] \} * [(365-p) / 365]$
 $= 0.68$

where:

- k = 2.6 (particle size multiplier for PM-10) (k = 10 for PM-30 or TSP)
- s = 4.8 mean % silt content of unpaved roads
- b = 0.4 Constant for PM-10 (b = 0.5 for PM-30 or TSP)
- c = 0.3 Constant for PM-10 (c = 0.4 for PM-30 or TSP)
- W = 35 tons average vehicle weight
- Mdry = 10 surface material moisture content, %
- p = 125 no. of days with at least 0.254mm of precipitation (see Fig/ 13.2.2-1)

$$0.68 \text{ lb/mi} * \qquad \qquad 97236 \text{ mi/yr} = \qquad \qquad 32.99 \text{ ton/yr}$$